

## **EXHIBIT B**

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF TEXAS  
3 SHERMAN DIVISION

4 THE STATE OF TEXAS, et al., )  
5 )  
6 vs. ) Plaintiffs, ) Case No.  
7 ) ) 4:20-cv-00957-SDJ  
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\_\_\_\_\_  
Defendant. )  
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)

11 DEPOSITION OF JOHN OLSON,  
12 30(b)(6) DESIGNEE FOR THE STATE OF IDAHO

13 May 3, 2024

23 Reported by:  
24 Rebecca Martin, CSR #1108, RPR, CRR  
25 Job No. CS6657429

1 DEPOSITION OF JOHN OLSON  
2

3 BE IT REMEMBERED that the deposition of  
4 JOHN OLSON was taken via videoconference by the  
5 Defendant before Veritext Legal Solutions, Rebecca  
6 Martin, Court Reporter and Notary Public in and for the  
7 County of Ada, State of Idaho, on Friday, the 3rd day of  
8 May, 2024, commencing at the hour of 11:10 a.m. in the  
9 above-entitled matter.

10  
11  
12 APPEARANCES:  
13

14 For the Defendant:  
15

16 FRESHFIELDS BRUCKHAUS DERINGER LLP  
17

18 By: ELIZABETH CURRAN, Esq.  
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1 Appearances (Cont.)

2 For the State of Missouri:

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7 Jefferson City, Missouri 65102

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9 Also Present: Vladimir Korneychuk, videographer

10 Chelsea Gilchrist, concierge

11 Lynn Mize

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1	I N D E X	
2	E X A M I N A T I O N	
3	JOHN OLSON PAGE	
4	By: MS. CURRAN 6	
5	E X H I B I T S	
6	No. Page	
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8	Advisory Regarding Relief	
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11	(260 pages)	
12	Exhibit 4 Plaintiff States' Combined ..... 108	
13	Responses and Objections to	
14	Goggle LLC's Second Set of	
15	Requests for Admission to	
16	Texas and First Set of	
17	Requests for Admission to	
18	Remaining Plaintiff States	
19	(27 pages)	
20	Exhibit 5 01/27/2024 Consumer Complaint ... 113	
21	Submission (34 pages)	
22	Exhibit 6 06/05/2023 Consumer Complaint ... 119	
23	Submission (2 pages)	
24	Exhibit 7 11/08/2019 Consumer Complaint ... 124	
25	Submission (5 pages)	
Exhibit 8 Idaho Code Section 48-603 ..... 145	(3 pages)	

1 identify whether Idaho -- or -- strike that.

2                   Sitting here today, you can't name any  
3 separate independent factual basis that's separate  
4 and apart from the factual bases that are common to  
5 all plaintiffs that are unique to Idaho for the  
6 antitrust state and federal in this case, correct?

7                   MS. SCHULTZ: Object to form.

8                   THE WITNESS: Yes, I believe that's correct.  
9                   Sitting here today, I do not know of an independent  
10 factual basis for the claims brought by Idaho that  
11 are distinct from those brought by the rest of the  
12 states.

13                  Q. (BY MS. CURRAN) I apologize if I already  
14 asked this, but for the state law antitrust claims,  
15 is Idaho proceeding in a sovereign capacity?

16                  A. It depends on the type of claim, but  
17 both under sovereign and parens patriae capacity.

18                  Q. For the state law, the DTPA claims, is  
19 Idaho proceeding parens patriae?

20                  A. Again, I'll just correct the record,  
21 just because Idaho's -- we have the Idaho Consumer  
22 Protection Act, which -- in other words, "the DTPA"  
23 is not a term that Idaho usually uses, as we don't  
24 have an act named that.

25                  Q. Right.

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1 REPORTER'S CERTIFICATE  
2

3 STATE OF IDAHO )  
4 ) ss.  
5 COUNTY OF ADA )  
6

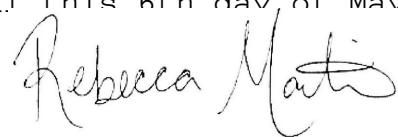
7 I, REBECCA MARTIN, Certified Shorthand Reporter and  
8 Notary Public in and for the State of Idaho, do hereby  
9 certify:  
10

11 That prior to being examined, the witness named in  
12 the foregoing deposition was duly sworn remotely by me to  
13 testify to the truth, the whole truth and nothing but  
14 the truth;

15 That said deposition was taken down by me in  
16 shorthand at the time and place therein named and  
17 thereafter reduced to typewriting under my direction,  
18 and that the foregoing transcript contains a full, true  
19 and verbatim record of said deposition.

20 I further certify that I have no interest in the  
21 event of the action.

22 WITNESS my hand and seal this 6th day of May 2024



23 REBECCA MARTIN  
24 RPR and Notary  
25 Public in and for the  
State of Idaho

My Commission Expires: 08-27-2024